

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN  
DISTRICT OF ALABAMA NORTHERN DIVISION

IN RE:

KATHRYN LARISSA ABBOTT,                     )  
XXX-XX-9449,                                     )  
Debtor,   ) CASE NO. 18-83555

**MOTION FOR PERMISSION TO CONVERT TO CHAPTER 13 BANKRUPTCY**

COMES NOW the Debtor, by and through her attorney, Jackie Ferguson Graham and files this her Motion For Permission To Convert To Chapter 13 Bankruptcy and shows unto this Honorable Court as follows:

1. The Debtor avers that this case was originally filed as a Chapter 7 bankruptcy in the United States Bankruptcy Court for the Northern District of Alabama, Northern Division on November 30, 2018.
2. The Debtor avers that at the time of the filing of her Chapter 7 bankruptcy that she owned a one-half unencumbered interest in a wooded lot located adjacent to her jointly owned marital residence. The Debtor avers that prior to the filing of her bankruptcy that she sought assistance from a local realtor as to the value of the lot. The Debtor avers that she was advised that the lot could be listed for \$8,000.00 to \$9,000.00 for sale but that the chance of anyone other than an adjoining landowner purchasing the property would be very low due to its shape, the number of trees on it and its lack of utilities. The Debtor avers that she filed her bankruptcy and thereafter learned that the Chapter 7 Trustee, through his appraiser/auctioneer, thought that said lot could be sold at auction for \$20,000.00.
3. The Debtor avers that she desires to convert to a Chapter 13 Bankruptcy so that she may pay the value of her interest in said non-exempt joint real estate into a Chapter 13 bankruptcy plan instead of losing the property in an auction by the Chapter 7 trustee. The Debtor avers that her creditors would actually receive more money if she paid \$10,000.00 through the Chapter 13 plan than if the property were auctioned due to the costs and fees of the auctioneer.
4. The Debtor avers that she files this motion in good faith with no intent to defraud the Court or her creditors.

WHEREFORE, PREMISES CONSIDERED, the Debtor moves this Honorable Court to grant her motion to convert her Chapter 7 Bankruptcy to a Chapter 13 Bankruptcy.

*Respectfully submitted,*

/s/ Jackie Ferguson Graham  
Jackie Ferguson Graham (FER014)  
Attorney for Debtor  
303 Williams Ave. SW #321  
Huntsville, AL 35801  
(256) 534-3435

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the Chapter 13 Trustee and the attached Creditor mailing matrix by placing a copy of same in the United States Mail, properly addressed and postage pre-paid and/or by Electronic Transmission on this the 21st day of January, 2018.

/s/ Jackie Ferguson Graham



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Label Matrix for local noticing  
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Case 18-83555-CRJ7  
NORTHERN DISTRICT OF ALABAMA  
Decatur  
Mon Jan 21 08:39:32 CST 2019  
(p)BANK OF AMERICA  
PO BOX 982238  
EL PASO TX 79998-2238

Independent Bank  
5050 Poplar Ave, Suite 110  
Memphis, TN 38157-0110

U. S. Bankruptcy Court  
400 Well Street  
P. O. Box 2775  
Decatur, AL 35602-2775

Belk  
PO BOX 530940  
Atlanta, GA 30353-0940

Care Credit/ Synchrony  
P.O. Box 960061  
Orlando, FL 32896-0061

Citicards  
P.O. Box 9001037  
Louisville, KY 40290-1037

Independent Bank  
5050 Poplar Ave. Ste 2200  
Memphis, TN 38157-2200

Synchrony Bank/ Amazon  
P.O. Box 960013  
Orlando, FL 32896-5015

Kathryn Larissa Abbott  
2512 Walker Road SE  
Decatur, AL 35603-5616

Bank of America, N.A.  
P O Box 982284  
El Paso, TX 79998-2284

Cardmember Service Center  
P.O.Box 6294  
Carol Stream, IL 60197-6294

Christopher Crites  
1900 Big Woods Road  
Seaman, OH 45679-9785

First National Bank of Omaha  
PO Box 2557  
Omaha, NE 68103-2557

Renasant Bank  
P.O. Box 11733  
Newark, NJ 07101-4733

Jackie Ferguson Graham  
303 Williams Ave SW, Ste 321  
Huntsville, AL 35801-6001

Tazewell Shepard  
Tazewell Shepard, Trustee  
PO Box 19045  
Huntsville, AL 35804-9045

Bank of America  
P.O. Box 15726  
Wilmington, DE 19886-5726

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Total 22

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